

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
May 4 4 36 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

---

Postal Rate and Fee Changes, 2000

---

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO ADVO INTERROGATORIES  
(ADVO/USPS-T13-51)

The United States Postal Service hereby provides the response of witness  
Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-51, filed on  
March 15, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
May 4, 2000

**RESPONSE OF POSTAL SERVICE WITNESS RAYMOND  
TO ADVO INTERROGATORIES**

**ADVO/USPS-T13-51. Please refer to your response to MPA/USPS-T13-51 concerning a definition of the term "outlier."**

- (a) Provide any decision rules you had concerning the identification of outliers.**
- (b) Identify all examples of outliers of which you are aware.**
- (c) You state that a lunch break scan at the end of the day would be considered an outlier. What were the standard times for lunch breaks? For example, if there is no break in the middle of the day, would that be considered an outlier? Please explain.**
- (d) You state that six vehicle inspection scans in a row would be an outlier. Please provide some examples of observations which indicate a vehicle inspection is occurring.**
- (e) Is vehicle inspection considered to be an "out-of-office" activity? Please explain.**

**RESPONSE:**

- (a) There were no formal decision rules concerning the identification of outliers. The data coordinators used their judgement and the field generated-marked-up sets to make corrections to the database. They would then run reports and scan for values that appeared to them as a point to be discussed with the data collectors. Outliers were not purged from the database; they were modified to an agreed-on change based on discussions between the data coordinators and data collectors.**
- (b) Please see response to ADVO/USPS-T13-39.**
- (c) Please see response to ADVO/USPS-T13-67.**
- (d-e) Vehicle inspection was an "in-office" activity and was therefore not part of the LR-1-163. The following sheets contain examples of sets of Vehicle Inspection scans, identified by Location "Vehicle."**

# Data Collected - Work Sampling

04/26/2000 8:17:13 PM

5/12/199

OBS37

CY48

Route: 0146

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A		N/A	N/A	
Regular Carrier	N/A		N/A		N/A	N/A		N/A	N/A	
Regular Carrier	Vehicle	8:01 AM	Vehicle Inspect	8:02 AM	Inside Work	N/A	8:02 AM	N/A	N/A	8:02 AM
Regular Carrier	Work Station	8:06 AM	N/A	8:06 AM	Inside Work	N/A	8:06 AM	Letters	Ltr Srt Empty	8:06 AM
Regular Carrier	Work Station	8:12 AM	N/A	8:12 AM	Inside Work	N/A	8:12 AM	Letters	Ltr Srt Empty	8:12 AM
Regular Carrier	Work Station	8:18 AM	N/A	8:18 AM	Inside Work	N/A	8:18 AM	Letters	Ltr Srt Empty	8:18 AM
Regular Carrier	Work Station	8:24 AM	N/A	8:24 AM	Inside Work	N/A	8:24 AM	Letters	Ltr Srt Partial	8:24 AM
Regular Carrier	Work Station	8:30 AM	N/A	8:30 AM	Inside Work	N/A	8:30 AM	Letters	Ltr Srt Partial	8:30 AM
Regular Carrier	Work Station	8:36 AM	N/A	8:36 AM	Inside Work	N/A	8:36 AM	Flats	Flt Srt Vert Em	8:36 AM
Regular Carrier	Work Station	8:42 AM	N/A	8:42 AM	Inside Work	N/A	8:42 AM	Flats	Flt Srt Vert Em	8:42 AM
Regular Carrier	Work Station	8:48 AM	N/A	8:48 AM	Inside Work	N/A	8:48 AM	Flats	Flt Srt Vert Em	8:48 AM
Regular Carrier	N/A	8:48 AM	N/A	8:48 AM	N/A	N/A	8:48 AM	N/A	N/A	8:48 AM
Regular Carrier	Work Station	8:54 AM	N/A	8:54 AM	Inside Work	N/A	8:54 AM	Flats	Flt Srt Vert Pa	8:54 AM
Regular Carrier	Work Station	9:00 AM	N/A	9:00 AM	Inside Work	N/A	9:00 AM	Flats	Flt Srt Vert Par	9:00 AM
Regular Carrier	Work Station	9:06 AM	N/A	9:06 AM	Inside Work	N/A	9:06 AM	Flats	Flt Srt Vert Me	9:06 AM

# Data Collected - Work Sampling

04/26/2000 6:15:51 PM

9/10/199

OBS39

CY47

Route: 1507

Job Class	Location		Personal		Delivery Type and Status			Activities		
Regular Carrier	N/A		N/A		N/A	N/A		N/A	N/A	
Regular Carrier	Vehicle	7:06 AM	Vehicle Inspect	7:07 AM	Inside Work	N/A	7:07 AM	N/A	N/A	7:07 AM
Regular Carrier	Work Station	7:12 AM	N/A	7:13 AM	Inside Work	N/A	7:13 AM	Letters	Mat'l Handling	7:13 AM
Regular Carrier	Work Station	7:19 AM	Superv. Instruct	7:19 AM	Inside Work	N/A	7:19 AM	N/A	N/A	7:19 AM
Regular Carrier	Work Station	7:25 AM	N/A	7:25 AM	Inside Work	N/A	7:25 AM	Letters	Ltr Srt Empty	7:25 AM
Regular Carrier	Work Station	7:31 AM	N/A	7:31 AM	Inside Work	N/A	7:31 AM	Letters	Ltr Srt Partial	7:31 AM
Regular Carrier	Work Station	7:37 AM	N/A	7:37 AM	Inside Work	N/A	7:37 AM	Letters	Ltr Srt Partial	7:38 AM
Regular Carrier	N/A	7:43 AM	N/A	7:43 AM	N/A	N/A	7:43 AM	N/A	N/A	7:43 AM
Regular Carrier	Work Station	7:43 AM	N/A	7:43 AM	Inside Work	N/A	7:43 AM	Letters	Ltr Srt Medium	7:43 AM
Regular Carrier	Work Station	7:49 AM	N/A	7:49 AM	Inside Work	N/A	7:49 AM	Letters	Ltr Srt Partial	7:49 AM
Regular Carrier	Work Station	7:55 AM	N/A	7:55 AM	Inside Work	N/A	7:55 AM	Letters	Ltr Srt Partial	7:55 AM
Regular Carrier	Work Station	8:01 AM	N/A	8:01 AM	Inside Work	N/A	8:01 AM	Letters	Ltr Srt Partial	8:01 AM
Regular Carrier	Work Station	8:07 AM	N/A	8:07 AM	Inside Work	N/A	8:07 AM	Flats	Flt Srt Vert Em	8:07 AM
Regular Carrier	Work Station	8:13 AM	N/A	8:13 AM	Inside Work	N/A	8:13 AM	Folded Flats	Flt Srt Vert Fu	8:13 AM
Regular Carrier	Work Station	8:19 AM	N/A	8:19 AM	Inside Work	N/A	8:19 AM	Flats	Flt Srt Vert Me	8:19 AM


## DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond  
Date: 5-4-00

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
May 4, 2000